

July 25, 2012

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

**Re: *Ex Parte* Communication, CG Docket No. 11-116, CG Docket No. 09-158, CC Docket No. 98-170**

Dear Ms. Dortch:

On July 26, 2012, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Krista L. Witanowski, Assistant Vice President, Regulatory Affairs, of CTIA – The Wireless Association® (“CTIA”), met with Nicholas Degani, Legal Advisor of Wireline Issues, Office of FCC Commissioner Ajit V. Pai. Consistent with our comments in this proceeding, CTIA strongly advocated that the FCC should not adopt any new cramming mandates for wireless services as there is no persuasive evidence that cramming is a widespread problem in the wireless industry, and the industry already works voluntarily to address any potential third party billing issues, including through the adoption and implementation of the Mobile Marketing Association Consumer Best Practices.

CTIA explained that the Commission has failed to demonstrate that wireless cramming is a prevalent consumer issue and urged that the Commission should instead address the growing number of TCPA complaints instead of devoting valuable resources to *de minimis* wireless cramming concerns. CTIA also explained that voluntary industry action will continue to prevent wireless cramming from becoming a significant consumer issue.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being electronically filed with your office. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

/s/ Krista L. Witanowski

Krista L. Witanowski

cc: Nicholas Degani